# West Lake Update

March 6, 2015

## EPA Continues Focus on Long-Term Remedy

In 2008, EPA issued its Record of Decision (ROD) for the West Lake Landfill Superfund Site in Bridgeton, Mo. The remedy called for the installation of an enginæred cover system over the radiologically-contaminated areas, long-term



groundwater monitoring and the adoption of institutional controls to restrict access. Commonly, this remedy has been referred to as "cap in place" due to the nature of the landfill cover and the absence of any excavation. A "cap in place" remedy is different from encapsulation which involves completely encasing the waste material.

In 2010, the EPA tasked the Responsible Parties RPs) to develop a Supplemental Feasibility Study (SFS) for OU1 to reevaulate the ROD-selected remedy as well as the potential remedial alternative of fullscale excavation of radiologically-impacted landfill material. The EPA approved and released the SFS in December 2011. Costs associated with the remedial alternatives evaluated in the SFS exceeded the trigger level that requires the National Remedy Review Board (NRRB) to conduct its own review. In 2012, the NRRB completed its review of the SFS and provided comments to Region 7 that require the RPs to develop additional studies under the SFS to strengthen sections of the original SFS and to support final decisions on remedy selection.

The Responsible Parties have begun conducting these studies with EPA Region 7 oversight. One of the main efforts includes looking at the extent of the radiologically impacted material (RIM) in Operable Unit 1 in order to better understand the work that would be involved with a partial excavation option. These additional studies also include consideration of an alternate cap design and of potential treatment technologies. Finally, the second feesibility study includes the development of a Fate and Transport Model to assist in better understanding the complexity of subsurface conditions as it relates to groundwater beneath and around the West Lake site.

When the additional studies under the SFS are complete, EPA will consider whether an amendment to the

ROD-selected remedy would be appropriate.

As with the original feesibility study, in selecting the final long-term remedy at the site EPA is required to consider the same nine criteria for each remedial alternative. The first two are threshold criteria, (i.e., required to be met): overall protection of human health and the environment and compliance with applicable or relevant and appropriate standards. Other criteria are balancing and modifying ones including: longterm effectiveness; performance; reduction of toxicity, mobility or volume through treatment; short-term

effectiveness; implementability; cost; and state and

community acceptance.

Throughout the process as we head towards the final decisions for a long-term remedy at the site, EPA Region 7, with support from EPA's Office of Research and Development, will continue working closely with our state and local partners. EPA has also engaged through interagency agreements independent scientific and engineering support from the United State Geological Survey (USGS) and the United States Army Corps of Engineers (USACE). In addition to reviewing the proposed isolation barrier, personnel from USACE's specialized Formerly Utilized Sites Remedial Action Program (FUSRAP) will assist EPA Region 7 by reviewing and providing feedback on key SSFS technical documents.

EPA remains committed to keeping the public fully informed of agency actions leading up to the longterm remedy decisions and to keep the public protected from the contaminants contained within the West Lake Landfill.

#### **EPA Partnership with USACE Remains** Strong

On February 9, EPA Region 7 Administrator Karl Brooks sent a letter to the United States Army Corps of Engineers' Kansas City and St. Louis districts affirming the partnership between the agencies and giving thanks for the expertise that the USACE has brought to the federal team at the site.

EPA looks forward to continuing to work with all of its partners at the West Lake Landfill Site as work continues towards the long-term remedy. The letter is available on EPA Region 7's West Lake Landfill webpage: www.epa.gov/region07/cleanup/west\_lake\_land-fill

# Next CAG Meeting: Monday, March 9

The next CAG meeting has been scheduled for Monday, March 9, at 6:30 p.m. at the Operating Engineers Local 513 Offices, 3449 Hollenberg Drive, Bridgeton, Mo., 63044.

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